



# **NEIGHBOURHOOD CARE NETWORK**

Being connected to stay safe

## **Privacy Policy and Procedures**

**July 2021**

# Background

The Neighbourhood Care Network Inc (NCN) is an independent incorporated association of local Bellingen Shire residents. The purpose of the NCN is to:

- send reliable and timely information about local emergencies and the COVID pandemic to our members, usually through SMS.
- support new and existing local neighbourhood groups to make sure that everyone is in touch and can help each other when needed.
- links local groups that want to do more, to each other and to resources.

The NCN is comprised of neighbourhood groups of varying size across the Bellingen Shire and surrounding areas. Each group has one or more volunteer coordinators.

The NCN has a small secretariat known as the Hub to support the organisation of groups, link groups to the resources that they need and disseminate reliable information from trusted sources.

## Purpose of this policy

This policy outlines NCN's commitments to protecting the privacy of personal information.

## Privacy policy

The NCN Management Committee is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

The purpose of this document is to provide a framework for NCN in dealing with privacy considerations.

NCN collects and administers a range of personal information for the purposes of managing the Network. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

NCN recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other.

These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

NCN is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

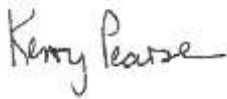
NCN will

- Ensure that all personnel who access the NCN Nation Builder membership management database will sign a confidentiality agreement and undertake a national police check every two years
- Collect only information which the organisation requires for its primary purpose.
- Ensure that information that is sent overseas, by way of cloud storage in the NCN administrative system, will be protected, secure and meet the same standards in privacy that the NCN is required to adhere to within Australia.
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered.
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent.
- Store personal information securely, protecting it from unauthorised access.
- Provide stakeholders such as volunteers and members with access to their own information, and the right to seek its correction.

# Signature Page

This NCN Policy has been approved by the Management Committee on 5 July 2021. It should be reviewed every two years.

**On behalf of the Neighbourhood Care Network Inc**



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**Kerry Pearse**  
**Chair**

**Date: 5 July 2021**

# Procedures

## Privacy Procedures

### Responsibilities

NCN's Management Committee is responsible for developing, adopting and reviewing this policy.

The NCN Management Committee is responsible for the implementation of this policy, for monitoring changes in privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

### Processes

#### COLLECTION

NCN will:

- Only collect information that is necessary for the performance and primary function of NCN which is to increase communication and information related to disaster preparedness and emergencies
- Notify members about why we collect the information and how it is administered.
- Notify members that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, for example a carer, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Minimise the amount of sensitive information that is collected and only collect it with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others.)

## USE AND DISCLOSURE

NCN will:

Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.

For other uses, NCN will obtain consent from the affected person.

In relation to a secondary purpose, use or disclose the personal information only where:

- a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
- the person has consented; or
- certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.

In relation to personal information which has been collected from a person never use the information for direct marketing unless an opt in and opt out clause has been offered and taken up.

State in NCN's privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as NCN is required to be.

Provide all individuals access to their personal information, except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that the personal information is not accurate, then NCN must take steps to correct it. NCN may allow a person to attach a statement to their information if the NCN disagrees it is inaccurate.

Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.

Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

## **STORAGE**

NCN will

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- Before NCN discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. NCN will have systems which provide sufficient security.
- Ensure that NCN's data is up to date, accurate and complete.

## **DESTRUCTION AND DE-IDENTIFICATION**

NCN will

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information NCN holds and will not use any government related identifiers.

## **DATA QUALITY**

NCN will:

- Take reasonable steps to ensure the information NCN collects is accurate, complete, up to date, and relevant to the functions we perform.

## **DATA SECURITY AND RETENTION**

NCN will:

- Only destroy records in accordance with the NCN's Records Management Policy.

## **OPENNESS**

NCN will:

- Ensure members and stakeholders are aware of NCN's Privacy Policy and its purposes.
- Make this information freely available in relevant publications.

## **ACCESS AND CORRECTION**

NCN will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

## **ANONYMITY**

NCN will:

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

## **MAKING INFORMATION AVAILABLE TO OTHER ORGANISATIONS**

NCN can:

- Release information to third parties where it is requested by the person concerned.

## **Authorisation**



**Signature of Chair**

**Kerry Pearse**

**Date: 5 July 2021**